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May 9, 2024

VIA ELECTRONIC CASE FILING

Honorable Rukhsanah L. Singh, U.S. Magistrate Judge
U.S. District Court for the District of New Jersey
Clarkson S. Fisher Building and Courthouse
402 East State Street
Trenton, NJ 08608

Re: *His All Holiness Bartholomew I, et al. v. Princeton University*
Civil Case No. 3:18-CV-17195-RK-RLS

Dear Judge Singh:

We represent Defendant, the Trustees of Princeton University, (“Princeton”) in the above-referenced action. We respectfully submit this letter on behalf of the Parties, with Plaintiffs’ consent. The Parties respectfully request an approximate 90-day extension of the current scheduling order. [ECF No. 142.] As detailed below, the extension is sought to allow sufficient time to accomplish the production, and subsequent analysis, of certain documents, as well as to allow for the consideration of the Parties’ formal motion concerning certain discovery disputes. [ECF No. 153.]

By way of background, the current scheduling order was issued on November 2, 2023, setting a discovery deadline of June 14, 2024. [ECF No. 142.] Following the issuance of that order the Parties held depositions and, in March 2024, identified six discovery disputes for the Court to address prior to the close of discovery. [ECF No. 149.] The Court ordered pre-motion letter-briefing on those issues due in April. [ECF No. 150.] Following the Court’s order, the Parties continued to confer over the issues in an attempt to limit/narrow them for the Court.¹ Through

¹ As an overarching matter, the Parties have worked well together throughout this litigation in resolving disputes, and scheduling and conducting discovery around Plaintiffs’ unique religious obligations over the various Eastern Orthodox holiday periods. They have also worked cooperatively in managing the issues arising from Princeton’s counsel’s health issues, and in tackling the logistical hurdles incidental to litigation where Plaintiffs are both several time-zones ahead and require translated communications.

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those efforts, the Parties were able to resolve four of the issues, leaving two for the Court to consider. [ECF Nos. 151 & 152.] Following submission of the Parties' affirmative letter-briefs on April 17, the Court directed Princeton to file a formal motion on the issues by May 17, 2024. [ECF No. 153.]

Pursuant to the Court's order, Princeton anticipates filing its formal discovery motion by the May 17, 2024, deadline. [ECF No. 153.] The earliest return date for this motion, however, is June 17th, which is after the current discovery deadline. As referenced in its pre-motion letter-brief, Princeton believes the issues presented to the Court in the formal motion will go toward case-dispositive facts, and discovery.² Additionally, one of the issues addressed in the forthcoming motion will be whether Plaintiffs must produce certain documents. Hence, depending on the outcome of the motion, Plaintiffs may need time to locate and produce those documents. Princeton in turn, would also need time to review those documents, have them translated, and evaluate whether further discovery/action is warranted.

In addition to the impact of the formal motion, an extension of the scheduling order is also warranted to allow for the separate production, and considerations of certain documents. Namely, in resolving four of the six discovery disputes identified for the Court [ECF No. 149], Plaintiffs agreed to produce certain documents. The Eastern Orthodox Easter holiday, however, impacts Plaintiffs' ability to address part of this production, as they must attend to the administration of the church's holy duties. As such, Plaintiffs do not anticipate producing certain documents until mid-to-late May. As before, following the production of these documents, Princeton will need to review them, send certain documents out for translation, wait for the translations, then review and make a determination as to whether further discovery/actions are warranted.

As such, the Parties submit that an approximate 90-day extension of the scheduling order is reasonable and appropriate, and that it will assist the Parties in completing discovery, and addressing any further issues with the Court.

The Parties also propose a date for an intervening status conferences, so that they may update the Court as to any lingering discovery, scheduling, or settlement possibilities that arise.

PROPOSED REVISED SCHEDULE

- August 14, 2024 – Status conference³
- September 13, 2024 – Deadline for all fact discovery

² Plaintiffs disagree with this characterization.

³ The Parties have proposed a date for a status conference, but are amenable to alternative dates that are more convenient to the Court.



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- October 14, 2024 – Deadline for affirmative expert disclosures
- November 14, 2024 – Deadline for responsive expert disclosures
- January 14, 2025 – Deadline for all expert discovery
- February 24, 2025 – Deadline for dispositive motions

Respectfully Submitted,

WONG FLEMING

By: /s/ Linda Wong
Linda Wong

And

HAHN LOESER

Samuel C. Sneed